

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

UNITED STATES OF AMERICA)
Plaintiff,)
)
)
)
v.	Case No.: 2:19-cr-00013
)
)
)
GEORGIANNA A.M. GIAMPIETRO	Chief Judge Waverly D. Crenshaw, Jr.
Defendant.)

MOTION FOR LEAVE TO FILE DOCUMENT UNDER SEAL

COMES NOW, Defendant, Georgianna Giampietro, by and through undersigned counsel and requests of the Court to allow the filing of defense's Motion In Limine Under F.R.E. 802 To Exclude "Individual A" Telegram Conversation, **Under Seal**. In support thereof, the defense states as follows:

1. The defense does not believe there is any information in the referenced Motion and Exhibits which is classified. The Motion and Exhibits, however, contain factual information that was provided to the defense pursuant to this Court's Protective Orders.
2. The Protective Orders do not direct that motions relying factual information provided pursuant to the Protective Orders be filed Under Seal. In the past the parties have utilized facts in their briefing that are subject to the Protective Orders.
3. With respect to the Motion and Exhibits, conversations between the defendant and Undercovers are discussed, and the attachments contain screenshots of conversations and texts between the defendant and the Undercovers.

4. In an abundance of caution, as there may be identifying information about the Undercovers in the filing the government would prefer to keep protected, defense moves that the Motion and Exhibits be filed under seal.
5. When this Motion was originally filed on August 19, 2021 (Doc. 241), counsel filed a Motion for Leave to File Under Seal (Doc. 235), and the Court originally granted Leave to File this Motion Under Seal.

Respectfully submitted this 24th day of November, 2021.

/s/ Charles D. Swift
CHARLES D. SWIFT
Pro Hac Attorney for Giampietro
Constitutional Law Center for Muslims in America
100 N. Central Expy., Suite 1010
Richardson, TX 75080
Phone: (972)-914-2507
Email: cswift@clcma.org

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 24th day of November, 2021, I electronically filed the foregoing with the Clerk of the Court, Under Seal, and sent copies of said filing to all counsel of record.

/s/ Charles D. Swift
CHARLES D. SWIFT
Pro Hac Attorney for Georgianna Giampietro